

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FREDERICK LYNCH)	
)	
Plaintiffs,)	Civil Action File No.
vs.)	
)	
CAVALRY SPV LLC)	
FREDERICK J HANNAH & ASSOCIATES))	
)	
Defendants.)	
_____)	

DEFENDANT’S NOTICE OF REMOVAL

TO:

The United States District Court for the Northern District of Georgia, Atlanta Division	Frederick Lynch 2548 Kelly Lake Dr. Decatur, Georgia 30032
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Frederick J. Hanna & Associates, P.C.
Attn: Scott Groghan
2253 Northwest Parkway
Marietta, Georgia 30067

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1446(a) and (b),
Defendant Cavalry SPV LLC (“Defendant”) hereby removes this case to the
United States District Court for the Northern District of Georgia, Atlanta Division
based on the following grounds:

1. This action is removable to the United States District Court under 28
U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the

complaint purports to allege a cause of action under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.*, the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 *et seq.*, and the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227 *et seq.*

2. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty days after Defendant’s receipt of the initial pleadings setting forth the claim for relief upon which this action is based.

3. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit “A” are copies of the following documents, which are all the process, pleadings and orders received by one or more Defendants in this action, to wit: documents bates numbered 1 through 8.

4. Upon receipt of this Notice, no further action shall be taken in the State Court of DeKalb County

5. By filing this Notice of Removal, the Defendant demonstrates its consent to the removal of the case to this Court. Furthermore, Defendant has obtained the consent of Defendant “Frederick J. Hannah & Associates” for removal of the case to this Court.

Respectfully submitted this 26th day of November, 2014.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust
Jonathan K. Aust

Georgia Bar No. 448584
John H. Bedard, Jr.
Georgia Bar No. 043473

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CAVALRY SPV LLC)	
FREDERICK J HANNAH & ASSOCIATES))	
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Defendants.)	
_____)	

CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing Defendant's Notice of Removal by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Frederick Lynch
2548 Kelly Lake Dr.
Decatur, Georgia 30032

Frederick J. Hanna & Associates, P.C.
Attn: Scott Groghan
2253 Northwest Parkway
Marietta, Georgia 30067

Respectfully submitted this 26th day of November, 2014.

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/s/ Jonathan K. Aust
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